

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

FILED
RICHARD W. HAGEL
CLERK OF COURT

OCT 30 2024 11:06 A

UNITED STATES OF AMERICA,

Plaintiff,

v.

KEITH DAVENPORT, III,
aka Keefy

ELLYSON JEFFRIES,

JAVOHN GARCIA,
aka JG

D'ANDRE BEASLEY,

JOHNA MCCOY,

VINCENT IRVIN,
aka V

Defendants.

CASE NO. *D:24-cr-103*

JUDGE *W. Madison*

INDICTMENT

18 U.S.C. § 2
18 U.S.C. § 371
18 U.S.C. § 922(a)(6)
18 U.S.C. § 924(a)(2)
18 U.S.C. § 1028A(a)(1)

FORFEITURE ALLEGATION

THE GRAND JURY CHARGES:

INTRODUCTION

At times relevant to this Indictment:

1. The following businesses were licensed dealers of firearms (also known as federal firearms licensees or "FFLs") within the meaning of Chapter 44, Title 18, United States Code:
 - a. A Brice Pawn Shop, 6220 Livingston Ave., Reynoldsburg, Ohio;
 - b. Ace Pawn Shop, 4896 West Broad St., Columbus, Ohio;
 - c. AimHi, 10299 Johnstown Road, New Albany, Ohio;
 - d. Alpha Star Tactical, 6287 Busch Blvd., Columbus, Ohio;

- e. Atlas Tactical Armory, 6475 E. Main St., Ste. 123, Reynoldsburg, Ohio;
- f. The Bullet Ranch, 1245 Broad St. SW, Pataskala, Ohio;
- g. Lev's Pawn Shop, 3446 E. Main St., Columbus, Ohio;
- h. Mike's Pawn Shop, 3745 Cleveland Ave., Columbus, Ohio;
- i. 1575 Precision Gunsmithing, 13217 Brandon Circle, Pickerington, Ohio;
- j. QuickShot Shooting Range, 1199 Zonolite Rd. NE, Atlanta, Georgia;
- k. Ranger Arms LLC, 1675 Old Henderson Rd. Columbus, Ohio;
- l. Wallace & Wallace Gun Shop, 630 Windy Hill Road SE, Smyrna, Georgia

2. Brownells, Inc. was an FFL based in Iowa. Brownells provided an online marketplace where other FFLs could offer firearms for sale.
3. Kentucky Gun Company was an FFL based in Kentucky. Kentucky Gun Company provided an online marketplace where other FFLs could offer firearms for sale.
4. Guns.com was an FFL based in Minnesota. Guns.com provided an online marketplace where other FFLs could offer firearms for sale.
5. Federal law requires that a firearm purchase through an FFL occur in the purchaser's state of residence. Therefore, a firearm that an Ohio resident purchases from an out-of-state FFL must be transferred to an FFL in Ohio, where the sale can be finalized. Local FFLs typically charge a nominal fee for this service.

COUNT 1
(Conspiracy to Commit an Offense Against the United States)

The Conspiracy

6. Paragraphs 1 through 5 of the Indictment are incorporated here.
7. From in or around May 2022, through at least in or around September 2022, the exact dates being unknown, in the Southern District of Ohio and elsewhere, the Defendants, **KEITH DAVENPORT, III, aka "Keefy" (hereinafter KEITH DAVENPORT, III)**,

ELLYSON JEFFRIES, JAVOHN GARCIA, aka "JG," (hereinafter JAVOHN GARCIA), D'ANDRE BEASLEY, JOHNA MCCOY, and VINCENT IRVIN, aka "V" (hereinafter VINCENT IRVIN), knowingly and intentionally conspired and agreed with each other, and with others known and unknown to the grand jury, to commit an offense against the United States, that is, to make a false statement in connection with the acquisition of a firearm, in violation of Title 18, United States Code, Section 922(a)(6).

Objects of the Conspiracy

8. It was the object of the conspiracy to purchase firearms from online FFLs using credit card information that did not belong to the Defendants, and that the Defendants did not have permission to use. It was further the object of the conspiracy to then transfer the firearms to, and then pick up the firearms at, FFLs located in the Southern District of Ohio, and elsewhere; in doing so, the Defendants would fill out required paperwork associated with firearms sales and falsely state that they were purchasing the firearms for themselves. It was further the object of the conspiracy to sell many of the firearms that were acquired illegally.

Manner and Means of the Conspiracy

9. The manner and means by which the Defendants, **KEITH DAVENPORT, III, ELLYSON JEFFRIES, JAVOHN GARCIA, D'ANDRE BEASLEY, JOHNA MCCOY, and VINCENT IRVIN**, and others known and unknown to the grand jury, sought to accomplish the objectives of the conspiracy included the following:

a. It was part of the conspiracy that a member of the conspiracy would purchase a firearm or firearms online from an FFL. Commonly, members of the conspiracy would purchase the firearms using another individual's credit card information, without that individual's authorization.

b. It was further part of the conspiracy that, when a member of the conspiracy purchased a firearm or firearms online, that member would do so in the name of another member of the conspiracy, for delivery to an FFL, often in the Columbus area.

c. It was further part of the conspiracy that a member of the conspiracy would complete the transfer of the firearm(s) at an FFL, often in the Columbus area.

d. It was further part of the conspiracy that, in completing the transfer of a firearm or firearms, a member of the conspiracy would submit a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives Form 4473, Firearms Transaction Record, (“ATF Form 4473”), falsely stating that he or she was the actual buyer of the firearm(s), when in fact he or she was often purchasing the firearm(s) for another member of the conspiracy.

10. As a result of the conspiracy, members of the conspiracy succeeded in having at least 50 firearms shipped to the Southern District of Ohio, and succeeded in obtaining at least 42 firearms.

Overt Acts

11. In furtherance of the conspiracy, and to effect the objects thereof, the conspirators performed and caused to be performed the following overt acts, among others:

a. On or about July 1, 2022, **JAVOHN GARCIA** went to A Brice Pawn Shop and completed the transfer of two firearms—a Glock and an FN—ordered by **KEITH DAVENPORT, III**, from Guns.com on or about June 29, 2022; in doing so, **GARCIA** submitted an ATF Form 4473 falsely representing that he was the actual transferee/buyer of the firearm.

b. On or about July 7, 2022, **JAVOHN GARCIA** went to 1575 Precision Gunsmithing and completed the transfer of a Glock firearm ordered from Guns.com on or about July 2, 2022; in doing so, **GARCIA** submitted an ATF Form 4473 falsely representing that he was the actual transferee/buyer of the firearm.

c. On or about July 7, 2022, **VINCENT IRVIN** went to A Brice Pawn Shop and completed the transfer of three firearms—an FN, a Glock, and a Romarm Draco—ordered from Guns.com on or about July 3, 2022; in doing so, **IRVIN** submitted an ATF Form 4473 falsely representing that he was the actual transferee/buyer of the firearms.

d. On or about July 8, 2022, **VINCENT IRVIN** went to Atlas Tactical Armory and completed the transfer of a Glock firearm ordered from Guns.com on or about July 3, 2022; in doing so, **IRVIN** submitted an ATF Form 4473 falsely representing that he was the actual transferee/buyer of the firearm.

e. On or about July 20, 2022, **JAVOHN GARCIA** went to Ace Pawn Shop and completed the transfer of four firearms—an FN and three Glocks—ordered from Kentucky Gun Co. on or about July 15, 2022; in doing so, **GARCIA** submitted an ATF Form 4473 falsely representing that he was the actual transferee/buyer of the firearms.

f. On or about July 20, 2022, **ELLYSON JEFFRIES** went to Ace Pawn Shop and completed the transfer of three Glock firearms ordered from Kentucky Gun Co. on or about July 15, 2022; in doing so, **JEFFRIES** submitted an ATF Form 4473 falsely representing that he was the actual transferee/buyer of the firearms.

g. On or about July 22, 2022, **ELLYSON JEFFRIES** went to Mike's Pawn Shop and completed the transfer of an FN firearm ordered from Brownells on or about July 16, 2022; in doing so, **JEFFRIES** submitted an ATF Form 4473 falsely representing that he was the actual transferee/buyer of the firearms.

h. On or about July 25, 2022, **ELLYSON JEFFRIES** went to Lev's Pawn Shop and completed the transfer of two firearms—a Glock and an FN—ordered from Kentucky Gun Co. on or about July 20, 2022; in doing so, **JEFFRIES** submitted an ATF Form 4473 falsely representing that he was the actual transferee/buyer of the firearms.

i. On or about July 25, 2022, **ELLYSON JEFFRIES** went to AimHi and completed the transfer of four firearms—an FN, two Glocks, and a Springfield Hellcat—ordered from Kentucky Gun Co. on or about July 21, 2022; in doing so, **JEFFRIES** submitted an ATF Form 4473 falsely representing that he was the actual transferee/buyer of the firearms.

j. On or about July 26, 2022, **JOHNA MCCOY** went to QuickShot Shooting Range and completed the transfer of two firearms—an FN and a Glock—ordered from Brownells on or about July 22, 2022; in doing so, **MCCOY** submitted an ATF Form 4473 falsely representing that she was the actual transferee/buyer of the firearms.

k. On or about July 27, 2022, **D'ANDRE BEASLEY** went to Mike's Pawn Shop and completed the transfer of three firearms—a Glock, an FN, and a Springfield XD—ordered from Brownells on or about July 24, 2022; in doing so, **BEASLEY** submitted an ATF Form 4473 falsely representing that he was the actual transferee/buyer of the firearms.

l. On or about July 28, 2022, **JOHNA MCCOY** went to Wallace & Wallace Gun Shop and completed the transfer of three Glock firearms ordered from Kentucky Gun Co. on or about July 26, 2022; in doing so, **MCCOY** submitted an ATF Form 4473 falsely representing that she was the actual transferee/buyer of the firearms.

m. On or about July 29, 2022, **ELLYSON JEFFRIES** went to The Bullet Ranch and completed the transfer of three firearms—two Glocks and an FN—ordered from Brownells on or about July 22, 2022; in doing so, **JEFFRIES** submitted an ATF Form 4473 falsely representing that he was the actual transferee/buyer of the firearms.

n. On or about July 29, 2022, **ELLYSON JEFFRIES** went to Ranger Arms and completed the transfer of four firearms—three Glocks and a Springfield Hellcat—ordered from Brownells on or about July 25, 2022; in doing so, **JEFFRIES** submitted an ATF Form 4473 falsely representing that he was the actual transferee/buyer of the firearms.

In violation of 18 U.S.C. § 371.

COUNTS 2-13
(False Statement During Acquisition of Firearm)

12. Paragraphs 1 through 5 of the Indictment are incorporated here.

13. On or about the following dates, in the Southern District of Ohio, each Defendant listed below, in connection with the acquisition of a firearm from the federal firearms licensee listed below, knowingly made a false and fictitious written statement to the federal firearms licensee, which statement was intended and likely to deceive the federal firearms licensee as to a fact material to the lawfulness of the sale of the firearm to the Defendant, in that the Defendant represented that he/she was the actual transferee/buyer of the firearm, when in fact, the Defendant was purchasing the firearm on behalf of another individual:

COUNT	APPROX. DATE	FIREARM(S) (Description, Serial Number)	DEFENDANTS	FALSELY REP'D AS TRANSFEE/ BUYER	FFL
2	7/1/22	Glock 19 Gen 5, AGFW566 FN five-seven, 386422424	JAVOHN GARCIA KEITH DAVENPORT, III	JAVOHN GARCIA	A Brice Pawn Shop
3	7/7/22	Glock 19, BUAL724	JAVOHN GARCIA KEITH DAVENPORT, III	JAVOHN GARCIA	1575 Precision Gunsmithing
4	7/7/22	FN five-seven, 3868900754 Glock 43, ADWH229 Romarm Draco, 22PG-2771	VINCENT IRVIN KEITH DAVENPORT, III	VINCENT IRVIN	A Brice Pawn Shop

COUNT	APPROX. DATE	FIREARM(S) (Description, Serial Number)	DEFENDANTS	FALSELY REP'D AS TRANSFEREE/ BUYER	FFL
5	7/8/22	Glock 19, AFCG434	VINCENT IRVIN KEITH DAVENPORT, III	VINCENT IRVIN	Atlas Tactical Armory
6	7/20/22	Glock 27, BVWL335 FN five-seven, 386421362 Glock 26, AGGB581 Glock 19, AFYK222	JAVOHN GARCIA KEITH DAVENPORT, III	JAVOHN GARCIA	Ace Pawn Shop
7	7/20/22	Glock 33, BWWV754 Glock 45, BVMX013 Glock 45, BVDS556	ELLYSON JEFFRIES KEITH DAVENPORT, III	ELLYSON JEFFRIES	Ace Pawn Shop
8	7/22/22	FN five-seven, 386427018	ELLYSON JEFFRIES KEITH DAVENPORT, III	ELLYSON JEFFRIES	Mike's Pawn Shop
9	7/25/22	Glock 30, BWWS758 FN five-seven, 386421366	ELLYSON JEFFRIES KEITH DAVENPORT, III	ELLYSON JEFFRIES	Lev's Pawn Shop
10	7/25/22	FN five-seven, 386431112 Glock 27, BVES012 Glock 36, AGKP608 Springfield Hellcat, BB204043	ELLYSON JEFFRIES KEITH DAVENPORT, III	ELLYSON JEFFRIES	AimHi

COUNT	APPROX. DATE	FIREARM(S) (Description, Serial Number)	DEFENDANTS	FALSELY REP'D AS TRANSFEREE/ BUYER	FFL
11	7/27/22	Glock, BXRN743 FN 509, GKS0287211 Springfield XD, BB104341	D'ANDRE BEASLEY KEITH DAVENPORT, III	D'ANDRE BEASLEY	Mike's Pawn Shop
12	7/29/22	Glock 19, BXRN745 Glock 43, BXKC197 FN 509, GKS0287254	ELLYSON JEFFRIES KEITH DAVENPORT, III	ELLYSON JEFFRIES	The Bullet Ranch
13	7/29/22	Springfield Hellcat, A639157 Glock 19, BXRN741 Glock 19, BXRN742 Glock 45, BMVM633	ELLYSON JEFFRIES KEITH DAVENPORT, III	ELLYSON JEFFRIES	Ranger Arms

In violation of 18 U.S.C. §§ 922(a)(6), 924(a)(2), and 2.

COUNT 14
(Aggravated Identity Theft)

14. On or about July 15, 2022, in the Southern District of Ohio, Defendant **KEITH DAVENPORT, III**, did knowingly possess and use, without lawful authority, a means of identification of another person, to wit: the credit card account number of D.M., during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), to wit: False Statement During the Acquisition of a Firearm, in violation of 18 U.S.C. § 922(a)(6), knowing that the means of identification belonged to another actual person.

In violation of 18 U.S.C. §§ 1028A(a)(1) and 2.

FORFEITURE ALLEGATION

15. Upon conviction of any of the offenses alleged in this Indictment, the Defendants, **KEITH DAVENPORT, III, ELLYSON JEFFRIES, JAVOHN GARCIA, D'ANDRE BEASLEY, JOHNA MCCOY, and VINCENT IRVIN**, shall forfeit to the United States, in accordance with 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c), any firearms and ammunition involved in or used in such violation(s), including, but not limited to, a Glock 19 Pistol, bearing serial number BXRN741, with any attachments and ammunition, and a Glock 43 Pistol, bearing serial number ADWH229, with any attachments and ammunition.

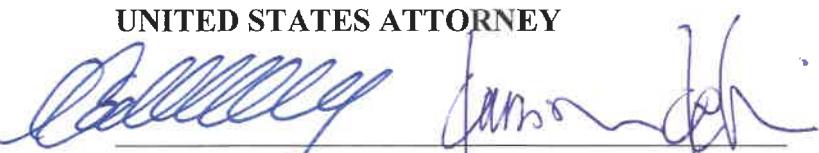
Forfeiture notice pursuant to 18 U.S.C. § 924(d)(1), 28 U.S.C. § 2461(c), and Rule 32.2 of the Federal Rules of Criminal Procedure.

A TRUE BILL.

s/Foreperson

GRAND JURY FOREPERSON

**KENNETH L. PARKER
UNITED STATES ATTORNEY**


**S. COUNTER SHIMEALL (OH 0090514)
DAMOUN DELAVIZ (PA 309631)
ASSISTANT UNITED STATES ATTORNEYS**